

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ROBERT JOHN SIMMONS, Individually	§	
And as Representative of the ESTATE OF	§	
GEORGIA ANN SIMMONS, JEFFREY	§	
ROBERT SIMMONS, and SHERRI RENE	§	CIVIL ACTION NO. 3:14-cv-00488
BOWMAN,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	
JOE M. FINCH, PsyD; KRANTI	§	
PURIMETLA, MD; AILEE FISHER, MD;	§	
RHONA MIRANDA, RN; THE TEXAS	§	
DEPARTMENT OF STATE HEALTH	§	
SERVICES,	§	
<i>Defendants.</i>	§	

**DEFENDANT’S UNOPPOSED MOTION
TO FURTHER EXTEND ANSWER DEADLINE**

TO THE HONORABLE JANE BOYLE:

Defendant The Texas Department of State and Health Services (“DSHS”) moves that the deadline to answer or otherwise respond to Plaintiffs’ Original Complaint be extended for all Defendants by one additional week to April 1, 2014. The current deadline for Defendants to answer is March 25, 2014. *See* Doc. #10.

Good cause exists for a further extension because this case involves multiple Defendants, and there is a question regarding representation of one or more Defendants.

The undersigned counsel has conferred with Plaintiffs’ counsel, who is unopposed to this motion.

DATE: March 21, 2014

Respectfully submitted,

GREG ABBOTT
Attorney General of Texas

DANIEL T. HODGE
First Assistant Attorney General

DAVID C. MATTAX
Deputy Attorney General for Defense
Litigation

JAMES "BEAU" ECCLES
Chief - General Litigation Division

/s/ Drew L. Harris

DREW L. HARRIS

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel for Plaintiffs, Peter Hofer by phone and email on March 21, 2014, and he indicated Plaintiffs are unopposed to this motion.

/s/ Drew L. Harris

DREW L. HARRIS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was sent via Electronic Filing Notification System on this the 21st day of March, 2014, to:

Peter Hofer
Liane Janovsky
DISABILITY RIGHTS TEXAS
Attorneys for Plaintiff

/s/ Drew L. Harris

DREW L. HARRIS